



de maximis, inc.

186 Center Street
Suite 290
Clinton, NJ 08809
(908) 735-9315
(908) 735-2132 FAX

September 16, 2019

VIA ELECTRONIC MAIL

Ms. Diane Salkie
ATTN: Lower Passaic River Remedial Project Manager
Emergency and Remedial Response Division
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, New York 10007

**Re: Monthly Progress Report No. 148 – August 2019
Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study
(RI/FS)
CERCLA Docket No. 02-2007-2009**

Dear Ms. Salkie:

de maximis, inc. is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.

Meetings/Conference Calls

- On August 7, EPA Region 2 (Region 2), CPG, and New Jersey Department of Environmental Protection (NJDEP) held a teleconference to discuss Current Conditions Sampling.
- On August 15, Region 2 and CPG held a teleconference to discuss the Upper 9-Mile Interim Remedy (IR) Completion.
- On August 21, Region 2 and CPG held a teleconference to discuss the Upper 9-Mile IR Completion.

Correspondence

- On August 1, Region 2 and CPG consultants exchanged emails to transmit model code for Feasibility Study (FS) Projection results.
- On August 1, CPG uploaded the Draft Current Conditions Biota Sampling Quality Assurance Project Plan (QAPP) to EPA's SharePoint site.

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- On August 5, Region 2 and CPG exchanged emails regarding scheduling a call to discuss Current Conditions Sampling schedules, split sampling and Biota sampling.
- On August 5, Region 2 indicated the revisions to the Final 17-Mile Remedial Investigation (RI) Report were acceptable and requested the final be posted to EPA's SharePoint site.
- On August 6, Region 2 and CPG consultants exchanged emails regarding methods to provide the Final 17-Mile RI Report files to Region 2.
- On August 6, Region 2 and CPG exchanged emails regarding the Physical Water Column Monitoring (PWCM) mooring coordinates for coordination with the National Oceanographic and Atmospheric Administration (NOAA) sampling team also working in the LPR.
- On August 8, Region 2 and CPG consultants exchanged emails regarding submission of Current Conditions Water Column Sampling data and current Region 2 data formats.
- On August 8, Region 2 provided CPG with the first set of comments on the Current Conditions Monitoring Program Small Volume Chemical Water Column Monitoring (SV CWCM) QAPP/Field Sampling Plan Addendum.
- On August 8, CPG submitted a variance request to NJDEP requesting approval to start gillnetting on September 9, 2019 for the Current Conditions Biota Sampling.
- On August 9, Region 2 and CPG consultants exchanged emails regarding the status of the Final 17-Mile RI Report Appendices.
- On August 9, CPG uploaded the Health and Safety Plan (HASP) for the Current Conditions SV CWCM to EPA's SharePoint site.
- On August 10, NJDEP replied to CPG that they could not grant the variance request to start gillnetting before September 15, 2019.
- On August 12, Region 2 provided additional comments to the SV CWCM QAPP to CPG.
- On August 12, CPG and Region 2 exchanged emails establishing that the CPG contractor would start Current Conditions Biota fish collection on September 9 and then commence fish collection using gillnets on September 15, 2019 as provided in the NJDEP Fish Collection Permit.
- On August 12, Region 2 provided questions to CPG regarding the Bioaccumulation Model.
- On August 12, CPG uploaded the Draft Upper 9-Mile IR FS to EPA's SharePoint site.
- On August 12, CPG provided Region 2 the transmittal letter for the Draft Upper 9-Mile IR FS and identified which sections and appendices were not uploaded at this time as they are subject to further discussions with Region 2 and NJDEP.
- On August 13, CPG provided Region 2 questions on the IR Completion Narrative Decision Tree.
- On August 14, Region 2 and CPG exchanged emails regarding submission of the Current Conditions Biota Sampling data.
- On August 14, Region 2 and CPG exchanged emails regarding Region 2 oversight of the PWCM equipment servicing activities.
- On August 14, Region 2 provided CPG comments received from NJDEP on the CPG's July 24, 2019 presentation on the Adaptive Management Example Framework.
- On August 15, CPG delivered the July Monthly Progress Report to Region 2.

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- On August 15, Region 2 provided CPG the summary description of the post-IR confirmation sampling approach Region 2 had provided NJDEP.
- On August 15, CPG uploaded the Current Conditions Sampling revised Draft SV CWCM QAPP to the EPA's SharePoint site.
- On August 15, CPG submitted the responses to comments (RTCs) on the Current Conditions Sampling revised draft SV CWCM QAPP to Region 2 and requested emailed provisional approval of the QAPP prior to mobilization the week of August 19, 2019.
- On August 16, Region 2 accepted the revisions to the Current Conditions Sampling revised draft SV CWCM QAPP and requested the document be finalized.
- On August 19, CPG uploaded the laboratory Standard Operating Procedures (SOPs) for the Current Conditions Biota Sampling QAPP to EPA's SharePoint site.
- On August 19, Region 2 and CPG exchanged emails regarding discussion topics for the scheduled August 20 teleconference on IR Completion.
- On August 21, CPG provided presentation materials to Region 2 from the August 21 teleconference on IR Completion.
- On August 22, Region 2 and CPG exchanged emails regarding the schedule to provide the Upper 9-Mile IR FS Completion and Adaptive Management Appendices to Region 2.
- On August 22, Region 2 and CPG exchanged emails regarding the PWCM field work schedule.
- On August 23, Region 2 and CPG exchanged emails regarding the updated PWCM field work schedule and Region 2 oversight participation.
- On August 28, Region 2 provided CPG the Region 2 and NJDEP comments on the Draft Current Conditions Biota Sampling QAPP.
- On August 30, Region 2 and CPG exchanged emails regarding the PWCM field work schedule for the week of September 2, 2019.

Work

- CPG continued work to address Region 2's comments on the modeling projections for the Upper 9-Mile IR FS.
- CPG continued to develop/draft Upper 9-Mile IR FS components/supporting documents.
- CPG continued to develop supporting documents for Current Conditions Sampling.
- CPG continued field work for the PWCM component of Current Conditions Sampling.
- CPG initiated field work for the SV CWCM component of Current Conditions Sampling.
- CPG continued preparations for the Biota Sampling component of Current Conditions Sampling.
- CPG continued work on revision and calibration of the Bioaccumulation Model.

(b) Results of Sampling and Tests

- None.

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(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion

- CPG will continue calibration of the Bioaccumulation Model.
- CPG will continue participation in meetings and conference calls with Region 2 and NJDEP and drafting the Upper 9-Mile IR FS.
- CPG will respond to Region 2 comments on outstanding Current Conditions Sampling QAPPs.
- CPG will continue the PWCM and SV CWCM field work.
- CPG will initiate the Current Conditions Biota Sampling program pending Region 2 approval of the QAPP.
- CPG will continue modeling projections for the Upper 9-Mile IR FS.
- CPG will continue work on Newark Bay Model documentation.

(d) Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.

- None

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

de maximis, inc.



Willard Potter
CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel
William Hyatt, CPG Coordinating Counsel
Lisa Baron, USACE
Clay Stern, USFWS
Reyhan Mehran, NOAA
Jay Nickerson, NJDEP
Beth Franklin, USACE
Laura Kelmar, AECOM
David Marabello, CDM-Smith
Scott Kirchner, CDM-Smith